

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BOAZ PLEASANT-BEY,)
)
Plaintiff,)
vs.) No. 3:19-CV-00486
)
STATE OF TENNESSEE, et al.,)
)
Defendants.)
_____)

DEPOSITION OF MARTIN LEE FRINK,

Taken on Behalf of the Plaintiff, 1:00 p.m.,
Tuesday, November 16, 2021, via Zoom, before:

BRIGGS & ASSOCIATES
222 Second Avenue North, Suite 340M
Nashville, Tennessee 37201
(615) 482-0037
MARTA G. HARRA
Licensed Court Reporter # 468
Certified Court Reporter #0317

APPEARANCES

For the Plaintiff:

BRANSTETTER, STRANCH & JENNINGS, PLLC
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For the Defendant State of Tennessee:

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APPEARANCES CONTINUED:

For the Defendant CoreCivic:

K&L GATES, LLP

Joseph F. Welborn, III

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I N D E X

MARTIN LEE FRINK

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Direct Examination by Ms. Herzfeld

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S T I P U L A T I O N S

The deposition of **MARTIN LEE FRINK**, taken on behalf of the Plaintiff on Tuesday, November 16, 2021, in the **via Zoom**, for all purposes under the Tennessee Rules of Civil Procedure.

The formalities as to notice, caption, certificate, et cetera, are waived. All objections, except as to the form of the questions, are reserved to the hearing.

It is agreed that **MARTA G. HARRA**, being a Licensed Court Reporter and Certified Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness are waived.

Marta G. Harra, LCR, CCR (931) 626-4952

MARTIN LEE FRINK,

was called as a witness, and after having been
first duly sworn, testified as follows:

DIRECT EXAMINATION BY MS. HERZFELD:

Q. Okay. Mr. Fink -- is it Frink, F-R-I-N-K?

A. Frink, F-R-I-N-K.

Q. Great. My name is Tricia Herzfeld and I represent
the plaintiff, Mr. Pleasant-Bey, in this case.

How are you doing this afternoon?

A. I'm well, thank you.

Q. Good.

And where are you currently located?

A. I am in Trousdale Turner Correctional Center
outside of Hartsville, Tennessee.

Q. Okay. And what is your full name?

A. Martin Lee Frink, F-R-I-N-K.

Q. Okay. And what's your date of birth?

A. 11/11/1964.

Q. Okay. And what is your job title at Trousdale
Turner?

A. Warden.

Q. Okay. And how long have you been in that position?

A. At this facility or as a warden?

Q. At that facility.

A. Since July.

1 Q. July of 2021?

2 A. That's correct.

3 Q. Okay. And had you worked at Trousdale prior to
4 July of 2021?

5 A. So I was named as the warden in May of 2021, but I
6 was not officially assigned here -- I didn't get
7 here until July of 2021.

8 Q. Okay.

9 A. So prior to May, no.

10 Q. And where were you before you were warden at
11 Trousdale Turner?

12 A. I was at the Tallahatchie Correctional Center in
13 Tutwiler, Mississippi.

14 Q. Okay. And what -- that's in Mississippi?

15 A. That's correct.

16 Q. Okay. And is that a CoreCivic facility?

17 A. Yes, ma'am.

18 Q. Have you been with CoreCivic your entire
19 corrections career?

20 A. No, ma'am.

21 Q. Okay. And where else have you worked in a
22 corrections capacity?

23 A. I was in Iraq and I was in the state of Texas.

24 Q. Okay. And in Iraq it was with the military?

25 A. No. I was a contractor.

1 Q. And who were you a contractor for?

2 A. That's a good question. It was a private company
3 that was contracted with the government. I think
4 it was 3M, I think, was the name of them. We did
5 corrections.

6 Q. I'm sorry, I didn't hear you. You did what?

7 A. We did corrections in Iraq.

8 Q. Okay. And what do you mean by "corrections"?

9 A. Prisons.

10 Q. You ran prisons?

11 A. Yes. I was a correctional counselor with the
12 Iraqi wardens that was assigned to the prisons I
13 was assigned to.

14 Q. Okay. And what years was that?

15 A. 2010 to 2011.

16 Q. Okay. And when were you in Texas?

17 A. From 1983 until 2000.

18 Q. And what was your position in Texas?

19 A. Correctional officer, sergeant, lieutenant,
20 captain, major.

21 Q. Worked your way up?

22 A. I did.

23 Q. Were you ever warden at a facility in Texas?

24 A. No, ma'am.

25 Q. Okay. Have you ever given a deposition before?

1 **A. I think so. I'm pretty sure I have.**

2 Q. Okay. In what type of case?

3 **A. I know it was a divorce that I had to give a**
4 **deposition in one time, and I think there was a**
5 **correctional -- there was a lawsuit in Montana**
6 **where I was also deposed.**

7 Q. Okay. And what was the nature of your testimony in
8 the divorce?

9 **A. A witness.**

10 Q. What were you a witness to?

11 **A. I'm sorry?**

12 Q. What were you a witness about?

13 **A. I had knowledge of a situation that was involving**
14 **two people that were getting divorced. They were**
15 **getting divorced.**

16 Q. Okay. And I understand that. I think that kind of
17 is the same thing as being a witness. I mean what
18 do you mean? Was it in a corrections capacity, was
19 it in a personal capacity? Like what did you know?

20 **A. Personal. It was personal.**

21 Q. Okay.

22 **A. It had nothing to do with corrections.**

23 Q. Okay. And did you testify in court or you just
24 gave a deposition?

25 **A. Just a deposition.**

1 Q. Okay. And how long ago was that?

2 A. Oh, probably 25 years ago or so.

3 Q. Okay. And what about the other lawsuit in Montana?

4 A. That would have been around 2014, 2015.

5 Q. Okay. And what was that about?

6 A. It was an inmate that was suing the prison that I
7 was a warden at.

8 Q. And who was suing the prison?

9 A. I don't remember his name.

10 Q. Was it a prisoner?

11 A. Yes, ma'am. I said inmate.

12 Q. Inmate? Okay. I'm having kind of a little bit of
13 a hard time hearing you. I think maybe the
14 connection's not super great. Should we bring the
15 phone maybe closer to you?

16 A. There's no place to sit it.

17 Q. Ah, I know that makes it kind of complicated. I'm
18 sorry about that.

19 And what was that prisoner suing the facility
20 that you were warden at about?

21 A. Medical. Hearing aids.

22 Q. Hearing aids. And do you know how that case
23 resolved?

24 A. I think it was dismissed.

25 Q. Okay. And did you have to testify at trial or you

1 just gave a deposition?

2 **A. Just a deposition.**

3 Q. Okay. And so you know the rules about giving
4 testimony in a deposition, that you've sworn to
5 tell the truth; is that right?

6 **A. Yes. Ms. Harra did that just a minute ago.**

7 Q. Okay, very good.

8 And if you need to take a break, you'll let me
9 know if you need to take a break?

10 **A. Sure.**

11 Q. Okay. And if you need to take a break I just ask
12 that you answer the question that I have pending
13 before we take that break. Okay?

14 **A. Yes, ma'am.**

15 Q. Okay. And who did you meet with or speak with
16 about your deposition today?

17 **A. Joe. Mr. Welborn.**

18 Q. Mr. Welborn. And did you meet with him in person
19 or over the phone or Zoom?

20 **A. Telephonically.**

21 Q. Okay. And when was that?

22 **A. Yesterday.**

23 Q. Okay. And for how long did you speak?

24 **A. Oh, I don't know. I think it was over an hour --**
25 **or around an hour.**

1 Q. Okay. And was there anybody else on the telephone
2 call?

3 **A. Erin.**

4 Q. Okay. Anybody else?

5 **A. Not to my knowledge.**

6 Q. And did you review any documents in advance of your
7 deposition today?

8 **A. No, ma'am.**

9 Q. I'm sorry, could you repeat it? I didn't hear you.

10 **A. No, ma'am.**

11 Q. Okay. And other than that roughly one-hour
12 conversation with Mr. Welborn and Ms. Polly, have
13 you done anything else to prepare for your
14 deposition today?

15 **A. No, not really.**

16 Q. Okay. Does anybody else know you're being deposed
17 today?

18 **A. Yeah, I think my staff. I told them not to mess**
19 **with me which, of course, we got a phone call right**
20 **in the middle of it, so that didn't work well.**

21 Q. Oh, that doesn't really work well for me either
22 because I also got a phone call the minute we
23 started this deposition. So I think you and I
24 might be in the same boat.

25 What is your understanding of the lawsuit and

1 why it is that you're testifying today?

2 **A. My understanding is that Inmate Pleasant-Bey is**
3 **wanting something to do with religious -- religious**
4 **services, and something about his safety.**

5 Q. Uh-huh. And do you know Inmate Pleasant-Bey?

6 **A. I know who he is.**

7 Q. Okay. And what do you know about him?

8 **A. I know he's an inmate assigned here until -- and**
9 **he's got a lawsuit against us.**

10 Q. Do you know anything else about him?

11 **A. No, not really.**

12 Q. Okay. Have you been told anything else about him?

13 **A. Just that he had a lawsuit.**

14 Q. Okay. And what is your understanding of the nature
15 of his religious claims?

16 **A. That he felt like he was not being treated as he**
17 **felt that he should be.**

18 Q. Okay. Do you know anything more specific than
19 that?

20 **A. I don't think so.**

21 Q. Do you know what his religion is?

22 **A. Muslim.**

23 Q. Okay. Do you know what his specific complaints are
24 about not being treated fairly?

25 **A. It's something about a pair of socks that he felt**

1 **like he needed, and then it was something about**
2 **some food for the feast.**

3 Q. Okay. And it says in the disclosure that we were
4 given about your testimony today that, "Martin
5 Frink has knowledge regarding Pleasant-Bey's
6 incarceration at Trousedale, the customs, policies,
7 education, and training at Trousedale, and the
8 allegations in this lawsuit, so I'm here to find
9 out what you know about those things.

10 So let's start with: What do you know about
11 Pleasant-Bey's allegations and lawsuit, other than
12 what we've just discussed?

13 A. **My understanding, he feels like he is entitled to**
14 **some other -- like I said, some food items that --**
15 **in completion of the Ramadan --**

16 Q. Uh-huh.

17 A. **-- and that there's some religious artifacts, like**
18 **a pair of socks and some headgear, that he feels he**
19 **needs.**

20 And then -- of course, I can tell you that he
21 **feels like he is not safe, and something about acts**
22 **of violence.**

23 Q. Okay. Let's put the safety and acts of violence
24 off to the side for a second and just talk about
25 the religious stuff.

1 Do you know if he's permitted to have the
2 socks that he says that he wants?

3 **A. No, ma'am.**

4 Q. No, you don't know or, no, he's not permitted?

5 **A. He's not permitted.**

6 Q. Okay. And do you know why not?

7 **A. They present a safety risk.**

8 Q. Okay. And did you make that determination or did
9 someone else?

10 **A. No, that was made prior to me being here.**

11 Q. Okay. Have you evaluated that safety risk and that
12 request, since you've been warden at the facility,
13 independently?

14 **A. I've been made aware of it and I have evaluated it.**

15 Q. Okay. And so you yourself have also determined
16 that those socks are inappropriate from a safety
17 perspective?

18 **A. Yes, ma'am, that's correct.**

19 Q. Who, if anybody, did you discuss that with when you
20 were making that determination?

21 **A. The assistant warden that oversees the religious
22 programs and the assistant warden over security.**

23 Q. Okay. And who are those two people?

24 **A. A.W. McCloud, who's over security, and A.W. Watwood
25 is over the religious.**

1 Q. Okay. And when did you have those conversations
2 with them about reevaluating this request for the
3 socks?

4 A. It was recently. I don't know the exact date, but
5 it was probably in the last -- probably the last
6 few weeks, a month maybe, at the most. I think it
7 was just probably the last few weeks.

8 Q. Before or after you were notified you would be a
9 witness in this case?

10 A. It was brought up before I was notified.

11 Q. Okay. And did you decide to reevaluate the policy
12 on your own and make your own determination after
13 discussing that with counsel or somebody at
14 CoreCivic, or what prompted that?

15 A. No, ma'am. When I was instructed that he had a
16 lawsuit against us, one of the things that was
17 brought up was the socks. And I asked, you know,
18 "What's going on with that?" And we had a
19 conversation about the fact that they are leather
20 socks. We consider leather gloves to be --
21 consider them to be a security risk because it can
22 deter the effects of an electronic shock that we
23 have on the fences, and the socks would be
24 classified as the same item like the gloves.

25 Q. Okay. And when were you made aware that he had

1 this lawsuit?

2 **A. Around the same time. Because that was one of the**
3 **questions that I had was about, you know, what was**
4 **the lawsuit about?**

5 Q. And how were you made aware of the lawsuit?

6 **A. I don't remember. As a matter of fact, I don't**
7 **remember that.**

8 Q. Were you made aware of other lawsuits?

9 **A. Throughout my career I have, yes, ma'am.**

10 Q. But at the Trousdale Turner facility were you made
11 aware of other lawsuits or were you only made aware
12 of Mr. Pleasant-Bey's lawsuit?

13 **A. I don't know that there are any others at this**
14 **particular time.**

15 Q. Oh, I know that there -- I believe that there are.

16 **A. Okay.**

17 Q. But the only one that you know is
18 Mr. Pleasant-Bey's?

19 **A. I would say.**

20 MR WELBORN, III: Object to form.

21 Q. (BY MS. HERZFELD) And you don't know how you were
22 made aware of Mr. Pleasant-Bey's lawsuit?

23 **A. It had to have been in a conversation. I just**
24 **don't remember it for sure.**

25 Q. Do you know who it was in a conversation with?

1 **A. No, ma'am, I just told you I didn't -- I didn't**
2 **quite remember.**

3 Q. Okay. And when you had this conversation would it
4 have been memorialized anywhere in an email or
5 writing?

6 **A. No.**

7 Q. Okay. And would there be any forms or
8 documentation that talks about the fact that you
9 re-reviewed this decision and made the decision
10 independently on your own that the socks were not
11 appropriate?

12 MR WELBORN, III: Object to the form.

13 **A. No, ma'am.**

14 Q. (BY MS. HERZFELD) I'm sorry, sir? I didn't hear
15 your answer.

16 **A. No, ma'am.**

17 Q. There wouldn't be any paperwork?

18 **A. No.**

19 Q. Okay. Did you have a meeting with the two
20 assistant wardens about that decision or how did
21 you have that conversation?

22 **A. Yeah, I spoke to them and asked what it was about.**
23 **And I don't remember if it was together or**
24 **separately, but I know I talked to -- I know I**
25 **talked to Watwood because he was over -- he's over**

1 the religious -- or religion, and then I talked to
2 McCloud because he's over security. And it may
3 have been together or it may not have been, I don't
4 recall.

5 Q. And you don't know if it was in person or over the
6 phone or over email?

7 A. Oh, no, it would have been in person.

8 Q. Okay.

9 A. I'm thinking that -- No, I don't remember.

10 Q. What were you thinking? You can try.

11 A. No, I don't want to tell anything that's not true.
12 I've been sworn to tell the truth so I don't want
13 to say something that's not true, so...

14 Q. I understand. But if you think you might know
15 where you might have, you know, written something
16 down, I'd want to know that so I can find it.

17 A. Oh, no, no, it wasn't -- no, it wasn't written
18 down.

19 Q. Okay. And do you keep paperwork as part of your
20 job as warden?

21 A. Yes, ma'am.

22 Q. And you know there's litigation involving this
23 issue with the socks with Mr. Pleasant-Bey; right?

24 A. I do.

25 Q. And do you think, as warden, it would be a good

1 practice to document decisions that you're making
2 regarding a particular prisoner, especially when
3 they are in litigation?

4 **A. Now, that --**

5 MR WELBORN, III: Object to the form.

6 **A. The decision was already made.**

7 Q. (BY MS. HERZFELD) You said the decision was
8 already made before you got there, but then you
9 affirmed the decision, when you got there,
10 independently. That was your testimony earlier;
11 isn't that right?

12 **A. That is correct.**

13 MR WELBORN, III: Object to the form.

14 Q. (BY MS. HERZFELD) Okay. So -- But you didn't
15 write that down anywhere?

16 **A. No, ma'am.**

17 Q. Okay. And the socks, I understand, you're saying
18 are like leather gloves.

19 But what about if someone was given the socks
20 when they were attending their religious services,
21 you know, for the half an hour that they are doing
22 prayer? The ten minutes that they are doing prayer
23 they are being observed by guards at that time; are
24 they not?

25 **A. Not always. Not correctional staff. Sometimes**

1 **it's the religious service chaplains who are --**

2 Q. Okay. But somebody is looking at them? You're not
3 leaving people in a room -- prisoners in a room
4 together without having somebody having eyes on
5 them; right?

6 **A. Typically speaking, that's correct.**

7 Q. Okay. Because that would be safe practice, I would
8 hope.

9 So what if someone took those socks and wanted
10 to put them on while they prayed for ten minutes
11 and then took the socks off and handed them back to
12 the person. What is the safety concern with that?

13 **A. Safety concern? Not sure how that piece would play**
14 **into being a safety concern. Typically I could see**
15 **where it would be possibly a sanitized -- or a**
16 **sanitary concern if, you know, you're handing your**
17 **socks to somebody quite frequently. I would have a**
18 **problem with that, but --**

19 Q. Okay. And you said the other issue you were made
20 aware of with Mr. Pleasant-Bey had to do with his
21 Muslim feast. What was your understanding of that
22 concern?

23 **A. My understanding was that he felt the need for**
24 **additional food items.**

25 Q. Do you know what they are?

1 **A. I was told like some dates or raisins or something,**
2 **fruit.**

3 Q. Okay. And did you re-review that decision --

4 **A. No, ma'am.**

5 Q. -- as warden?

6 **A. I did not.**

7 Q. Okay. So that warden -- that decision was made by
8 a previous warden, to your knowledge?

9 **A. Yes, ma'am.**

10 Q. Okay. And do you know any concerns with dates?

11 **A. I have concerns with fruit, particularly because**
12 **the inmates have been known to make wine or alcohol**
13 **out of fruits, and so we limit the fruits that are**
14 **given to the inmates and how they are given to**
15 **them. Usually it's in a cup or some type of**
16 **chopped up fruits that is through the kitchen area.**

17 Q. Okay. And do they sometimes call that hooch? The
18 prisons I grew up in, they called that hooch.

19 **A. There's different names in different systems. I've**
20 **heard, you know, a lot of different ways it's**
21 **described.**

22 Q. Okay. And is there not an availability to put
23 dates in a cup and hand them like other fruits?

24 **A. Has it been discussed? Not to my knowledge.**

25 Q. Okay. But do you know if there's any reason that

1 you can't put dates in a cup and hand it out like
2 other fruits if the concern is making the alcohol
3 like you had said?

4 **A. I know that we give the food items that are**
5 **specifically allowed to have them participate or go**
6 **through their religious services.**

7 Q. I guess I'm trying to figure out what the concern
8 is with dates.

9 **A. The only thing I can tell you is, you know, inmates**
10 **make wine and hooch, as you said, alcohol, and so**
11 **that is a major concern with dates or raisins or**
12 **whatever other fruit that may have been requested.**

13 Q. Okay. But I just want to make sure I understood
14 your testimony, that other fruits are given to
15 inmates. They are not denied fruit in prison at
16 Trousdale; is that right?

17 **A. Well, they do have a fruit cup. So it's not a date**
18 **or a raisin, you know, it's typically like the**
19 **mixed pear or peach cup.**

20 Q. Okay. And so is your testimony that your
21 understanding is there's a difference in some sort
22 of a safety or security concern between a fruit cup
23 and a date?

24 **A. Yes, ma'am, that's correct.**

25 Q. Okay. And where did you get that information from,

1 that understanding?

2 **A. Oh, no, you asked my opinion. That's my opinion of**
3 **it.**

4 Q. Okay. Do you know if others at CoreCivic share
5 that opinion?

6 **A. I do not know.**

7 Q. Okay. What about others at Trousdale Turner?

8 **A. Again, I don't know.**

9 Q. Okay. And in preparation for your deposition today
10 did you learn about any other concerns with food,
11 other than the dates for the feast?

12 **A. I don't remember it.**

13 Q. Okay. So I just want to make sure, because we've
14 got this topic area that you were -- that you were
15 designated to discuss, and I want to make sure I
16 understand all of your knowledge.

17 **A. Well, it may have been. I'm not saying that it**
18 **wasn't, but I don't remember if there was anything**
19 **in particular.**

20 Q. Okay. And in that knowledge you had said that
21 there was the safety concerns and the religious
22 concerns. And you had said the pair of socks and
23 then there was some issue with food for the feast.
24 And then you also said that you thought that there
25 was an issue, maybe, with some headgear.

1 Do you know what the concern is with that?

2 **A. You're cutting out. Ma'am, you're cutting out**
3 **really badly. I'm not sure what you were saying.**

4 Q. Oh, okay, I'll start over. Can you hear me now?

5 **A. Yeah. You're freezing up and it's scattered or**
6 **broken up. Am I the same?**

7 Q. No. We can see you fine, I think.

8 **A. Well, not so much seeing, but you're kind of**
9 **breaking up.**

10 Q. I'll try to take off my audio and put it back on.

11 Okay?

12 (A discussion was held off the record.)

13 Q. (BY MS. HERZFELD) Can you hear me better now?

14 **A. Yes, apparently I can.**

15 Q. Okay. Wonderful.

16 MS. HERZFELD: Are we still on the
17 record?

18 THE REPORTER: Yes, ma'am.

19 MS. HERZFELD: Okay, very good.

20 Q. (BY MS. HERZFELD) Okay. So when we had talked
21 about your knowledge of the lawsuit, you talked
22 about the safety issues and then you talked about
23 religious issues and you had said concerns about a
24 pair of socks.

25 Have we talked about everything you know about

1 the concerns about the pair of socks?

2 **A. Oh, was that a question?**

3 Q. Yes.

4 Have we talked about everything you know about
5 the concerns about the pair of socks?

6 **A. Yes, ma'am, I believe so.**

7 Q. Okay. And the food, we talked about the food and
8 the feast, and we just had a conversation about
9 dates.

10 Do you have any other information about
11 concerns about the food or the feast?

12 **A. Okay. You said something about -- you're cutting**
13 **out again -- something about the food.**

14 Q. Do you know anything else about concerns about the
15 food or the feast?

16 **A. No, ma'am.**

17 Q. Okay. And then the third thing you had talked
18 about was religious headgear?

19 **A. Correct.**

20 Q. Okay. What do you know about the concerns for
21 religious headgear?

22 **A. There's something about particular headgear that is**
23 **wrapped around the head and -- instead of the**
24 **normal approved kufi.**

25 Q. Okay. And your understanding is that is something

1 that Mr. Pleasant-Bey has requested?

2 **A. That's my understanding, yes.**

3 Q. Okay. And do you know how you came to that
4 understanding?

5 **A. I believe Joe informed me of that.**

6 Q. Okay. And I don't want you to tell me anything
7 that you and Joe have talked about or you and Erin.

8 Have you read the lawsuit in this case?

9 **A. No, ma'am.**

10 Q. Okay. And what is your understanding of where
11 things stand with the request for the headgear?

12 **A. It was denied, from my understanding.**

13 Q. Okay. And do you know why it was denied?

14 **A. Because it presents a safety risk.**

15 Q. Okay. And is that a decision that you made or a
16 decision that predated you?

17 **A. It predated me, but I agree with it.**

18 Q. Okay. And did you have a meeting with someone to
19 discuss it?

20 **A. Just with Joe.**

21 Q. Okay. And did you memorialize your agreement of
22 that position in writing anywhere?

23 **A. No, ma'am.**

24 Q. Okay. Did you have any discussions with anyone at
25 the Tennessee Department of Corrections about any

1 of these religious issues with Mr. Pleasant-Bey?

2 **A. I have not.**

3 Q. Okay. Have you talked to anybody at CoreCivic
4 that's higher in the food chain, so to speak, than
5 you are about any of these concerns with
6 Mr. Pleasant-Bey's lawsuit?

7 **A. No, ma'am.**

8 Q. All right. Okay, and so is that your understanding
9 of everything -- is that your understanding, in the
10 lawsuit, about religious issues with
11 Mr. Pleasant-Bey?

12 **A. I would say, yes, that's correct.**

13 Q. Okay. Do you know anything about volunteers?

14 **A. Oh, yes, something about not being allowed**
15 **volunteers to come in.**

16 Q. Okay. And what is your understanding of where that
17 stands?

18 **A. I would allow it if they were volunteer. I've just**
19 **not been made aware of any volunteers that wanted**
20 **to come in.**

21 Q. And who is the current chaplain at Trowsdale?

22 **A. We have two of them.**

23 Q. Okay. Who are they?

24 **A. Sean Burger and Fletcher.**

25 Q. Okay. And who is it that deals with accommodations

1 for Muslim inmates, is that both of them or just
2 one?

3 **A. That's a good question. I think that -- I don't**
4 **know. I don't want to tell a story.**

5 Q. You don't want to speculate?

6 **A. No, ma'am.**

7 Q. Okay, very good.

8 Have you ever heard of the Quran being banned
9 at Trousdale Turner?

10 **A. Quran was all I got out of that.**

11 Q. Have you ever heard of the Quran being banned as a
12 book to be purchased at Trousdale Turner?

13 **A. I think that was discussed with Joe and I.**

14 Q. Okay. What is your understanding of whether or not
15 the Quran is banned from purchase at Trousdale
16 Turner.

17 MR WELBORN, III: Object to the form, to
18 the extent it's getting into attorney/client
19 communication.

20 Q. (BY MS. HERZFELD) Yeah, definitely don't tell me
21 what you and Joe talked about. I just want to know
22 your understanding of whether the Quran is able to
23 purchased by an inmate currently at Trousdale
24 Turner?

25 **A. My understanding was that it's -- you know, I don't**

1 **even know. I didn't even look at that.**

2 Q. Okay. So you don't know if currently the Quran can
3 be purchased by an inmate?

4 **A. No, I'm not sure.**

5 Q. Okay. Do you think it's --

6 **A. Normally the -- normally --**

7 Q. You can go ahead and finish.

8 **A. Normally the chaplain would handle the part about**
9 **the religious --**

10 Q. Okay. And do you think it would be appropriate for
11 the Quran to be banned from purchase at Trousdale
12 Turner?

13 **A. I would have to spend a little bit of time figuring**
14 **out what all transpired with that before I made an**
15 **assessment.**

16 Q. You mean in the past?

17 **A. Yes, ma'am.**

18 Q. All right. But, as the warden today, would you
19 approve if they wanted to ban the Quran from
20 purchase for the prisoners?

21 **A. Again, I would have to look at all the components**
22 **of it based on what's been said or what was**
23 **evaluated in the past before I made that decision.**

24 Q. Okay. And what training have you had in the First
25 Amendment, sir?

1 **A. Well, just whatever I've been given throughout my**
2 **career.**

3 Q. Have you taken classes in the First Amendment?

4 **A. I took classes in history where they talked about**
5 **the constitution and the amendments, yes.**

6 Q. Okay. And do you have an understanding of, you
7 know, what religions, if any, can be discriminated
8 against in a public setting?

9 **A. I would say none.**

10 Q. Okay. And do you think singling out the Quran to
11 be banned, as the fundamental Islamic text, could
12 be considered a First Amendment violation?

13 **A. You cut out. Something about text.**

14 Q. Yeah. So you understand that the Quran is one of
15 the quint essential texts of the Muslim faith; is
16 that right?

17 **A. Yes, ma'am.**

18 Q. Okay. And does it -- would it concern you that
19 there might be a constitutional violation if that
20 text was banned from purchase by inmates at a
21 public facility?

22 **A. You're cutting out again, ma'am. You started**
23 **something with a "P," and I'm not sure what you**
24 **said with that.**

25 Q. Okay. Maybe we need to go off the record for a

1 second in order to be able to get this back on.

2 Can you call in over the telephone or
3 something because I'm -- I don't want to waste my
4 precious time with you not being able to hear me,
5 and I know your time is precious, too.

6 **A. That's up to you-all.**

7 Q. Is there a way -- Do you have a telephone there you
8 can dial in?

9 **A. Yeah. I'm on the telephone right here.**

10 Q. Do you have a landline?

11 **A. I do.**

12 Q. Do you think you could hear me better on the
13 landline instead of on the cell phone?

14 **A. I'm not listening to you on a cell phone. I don't**
15 **have the audio on. It's on the computer.**

16 Q. It's on the computer? Okay.

17 MS. HERZFELD: Does anybody else have a
18 suggestion in how we can make this work?

19 (A recess was taken from 1:40 a.m. to
20 1:45 p.m.)

21 Q. (BY MS. HERZFELD) Okay, Mr. Frink, before we had
22 that technical difficulty I think we were talking
23 about if you think it's appropriate that one
24 religious text be banned from prisoners at a
25 facility when others are not.

1 **A. You know, depending on what the context of the --**
2 **you have to take safety and security into account**
3 **for any type of situation that could put people in**
4 **danger or jeopardy.**

5 Q. Uh-huh.

6 And what do you think are some safety and
7 security concerns that could put people into
8 jeopardy with the text of the Quran?

9 **A. I don't know.**

10 Q. Have you read the Quran?

11 **A. Have I read the Quran?**

12 Q. Yes, sir.

13 **A. No, ma'am.**

14 Q. Okay. And I think I cut you off. You were going
15 to say something else.

16 **A. Well, I don't -- I don't remember.**

17 Q. Okay. Okay, so we discussed the Quran, volunteers,
18 food, headgear, and socks.

19 Can you think of any other religious issues
20 that you've been made aware that Mr. Pleasant-Bey
21 is having at Trousdale Turner?

22 **A. No, ma'am, not at this time.**

23 Q. Do you know how many efforts are being made to try
24 to accommodate him in a way -- to accommodate his
25 religious needs in a way that does comply with

1 security and safety?

2 MR WELBORN, III: Object to the form.

3 **A. No, not that I'm aware of.**

4 Q. (BY MS. HERZFELD) Do you know if there's any
5 ongoing meetings or if you've had any meetings with
6 either of the chaplains about, you know, discussing
7 with Muslim inmates better ways to accommodate
8 their concerns?

9 **A. I've not heard of -- when you say "they're," I've**
10 **not heard of anyone else that has any complaints.**

11 Q. Oh, okay.

12 Well, what about Mr. Pleasant-Bey's
13 complaints, have you had any meetings with anyone
14 to see if there's a way to address those concerns
15 in a different way?

16 **A. No, ma'am.**

17 Q. Okay. And have you discussed with TDOC any ways to
18 address those concerns within their policies?

19 **A. No, ma'am.**

20 Q. Okay. Have we now covered the entirety of your
21 knowledge on Mr. Pleasant-Bey's concerns about
22 religious issues at Trousdale Turner?

23 **A. Yes, I guess. You know, the thing that -- I see**
24 **him from time to time, out on the walkway or during**
25 **the rounds, and I've not had him to approach me**

1 with any concerns or any issues other than what
2 you're bringing up at this time. There are several
3 avenues to which he can address his concerns at the
4 facility level and he has never expressed any
5 issues with me.

6 Q. You've been there since July?

7 A. Correct.

8 Q. And this lawsuit was already filed before you got
9 there?

10 A. Yes, ma'am.

11 Q. Okay. And so this lawsuit's been around longer
12 than you have been; right?

13 A. Yeah. But you were asking me questions like -- so
14 I thought maybe that you thought I had been here
15 longer.

16 Q. No, I know you've just been there since July,
17 because I think we've deposed the former wardens as
18 well, and I think there's been a couple. I just
19 wanted to be sure I understood all of your
20 knowledge about that.

21 Okay. And then the next thing you had talked
22 about were the safety concerns. And what is your
23 understanding of the safety concerns that are at
24 issue in Mr. Pleasant-Bey's lawsuit?

25 A. Said he did not feel safe.

1 Q. Okay. And do you know why?

2 A. No. He said that there was a lot of violence.

3 Q. Okay. What else?

4 A. I think that's about it.

5 Q. Okay. And do you think there's a lot of violence
6 at the facility?

7 A. Oh, no, ma'am.

8 Q. Okay. Why do you say that? What do you measure it
9 on?

10 A. My experience in the 38 years of -- 38-plus years
11 of corrections.

12 Q. Uh, okay. And so how do you measure that?

13 A. Ma'am, I've been in a lot of different prisons
14 where there's, what I would consider to be,
15 violence, and this doesn't rank with them.

16 Q. Oh, okay. And what types of facilities have
17 violence that you think ranks with them?

18 A. Ranks with what?

19 Q. The others. Like you said some are violent and
20 some -- and this one does not rank that way. So
21 give me some examples of how you could describe a
22 violent facility versus Trousdale Turner, which
23 your testimony is is not violent.

24 A. Well, you asked me --

25 MR WELBORN, III: Object to the form.

1 Q. (BY MS. HERZFELD) I'm sorry, I'm going to stop and
2 ask the question again.

3 Is your testimony that you don't think that
4 Trousdale Turner is a violent facility?

5 **A. I would say, based on your question, do I think**
6 **Trousdale Turner is a violent facility? No, ma'am,**
7 **I do not.**

8 Q. Okay. So then backing up and asking my question
9 again, what -- what is the difference between
10 Trousdale Turner, which you're saying is not a
11 violent facility, and other facilities in your
12 38 years of experience that you would classify as
13 violent facilities?

14 **A. Yes, ma'am. I've been assigned to other prisons**
15 **where they had a lot more gang activity, there was**
16 **a lot more stabbings, and this one would not, in my**
17 **opinion, classify the same as those.**

18 Q. Okay. You've been at this facility since July?

19 **A. Correct.**

20 Q. Okay. And you understand that there is a contract
21 for minimum staffing requirements; is that right?

22 **A. Yes.**

23 Q. Okay. How many days since you've been present as
24 the warden at the Trousdale Turner facility has it
25 been in compliance with the contract for minimum

1 staffing requirements?

2 A. It has not.

3 Q. It has not when, sir?

4 A. I'm sorry?

5 Q. I think you cut out. You said it has not?

6 A. That's correct.

7 Q. Okay. I'm going to ask the question again just
8 because I want to make sure I have it clear.

9 Since you've been warden at Trousdale Turner
10 how many days has Trousdale Turner been in
11 compliance with the staffing requirements under the
12 contract?

13 A. Yes, ma'am, that's the answer I gave you.

14 Q. Which is, it's not? It's never -- you've never
15 been in compliance with the staffing requirements
16 since you've been warden; do I understand you
17 correctly?

18 A. That is correct. We have -- That is correct.

19 Q. Okay. And how many days have you been in
20 compliance by 75 percent since you've been warden?

21 A. Oh, I don't know, I don't track it at that. I've
22 not tracked it at that.

23 Q. Okay. Do you know what a liquidated damages
24 payment is?

25 A. Do I know what -- what?

1 Q. A liquidated damages payment.

2 **A. Yes, I've heard of it.**

3 Q. Okay. And what do you know that to be?

4 **A. Where the contractor assesses a fine or a**
5 **liquidated damage based on whatever compliance or**
6 **contract requirement that they are addressing at**
7 **that time.**

8 Q. Okay. And do you know if, based on Trousdale
9 Turner's noncompliance with the minimum staffing
10 requirements, if CoreCivic has had to pay TDOC
11 liquidated damages since you have been the warden
12 at Trousdale Turner?

13 **A. No, we've not since I've been the warden here.**

14 Q. Okay. And do you know why not?

15 **A. No, ma'am.**

16 Q. Has it come up at all?

17 **A. No, ma'am. Huh-uh.**

18 Q. Do you know if it's because it happens quarterly or
19 monthly and you haven't been there long enough?

20 **A. I don't know.**

21 Q. Have you had any meetings with anyone at CoreCivic
22 about the staffing levels at Trousdale Turner?

23 **A. Yes, ma'am.**

24 Q. Who with?

25 **A. Oh, there's been numbers of people from human**

1 **resources, recruiters, my supervisor, my managing**
2 **director.**

3 Q. Who's your managing director?

4 A. **Vance Laughley (ph) -- Laughlin.**

5 Q. And how often have you met with Mr. Laughlin about
6 the staffing issues at Trousdale?

7 A. **Oh, I don't know the exact number, ma'am.**

8 Q. Can you give me an estimate, like half a dozen, 50?

9 A. **Well, I'd hate to guess and then be wrong about it**
10 **since I was sworn to tell the truth. I would say**
11 **that it's been a few times.**

12 We're doing a lot of recruiting, we're having
13 hiring events. So, you know, there's a lot of ways
14 that that question has been communicated with
15 different people.

16 Q. When you've had your meetings with your managing
17 director about the staffing at Trousdale, what have
18 you discussed?

19 A. **I just told you. Typically ways to hire or what**
20 **we're doing in hiring.**

21 Q. Has he expressed any concerns about the staffing
22 levels at Trousdale Turner?

23 A. **Yeah. I'd hate to put words into his mouth. I**
24 **don't know if it would be, you know, prudent for me**
25 **to say his concerns or not.**

1 Q. It would be because he told you and you're under
2 oath and I get to ask you questions about
3 conversations you've had with other people.

4 So what concerns, if any, has he expressed to
5 you about staffing levels at Trousdale Turner?

6 MR WELBORN, III: Object to the form.

7 **A. That we need to continue working on hiring staff.**

8 Q. (BY MS. HERZFELD) Okay. And why is it important
9 to continue working on hiring staff? Has he told
10 you that?

11 **A. It's like any other job. I mean you have to have**
12 **staff. You know, I think it's a problem throughout**
13 **the United States in a lot of different**
14 **correctional systems. And, you know, even going to**
15 **different restaurants I see that there's people**
16 **hiring, so you have to have employees.**

17 Q. Why is it important to have employees at a
18 correctional facility?

19 **A. It's important to have employees at a correctional**
20 **facility to assure the safety and security of the**
21 **institution.**

22 Q. Okay. When you talk about the "institution," you
23 mean the staff; right?

24 **A. No, ma'am, the facility --**

25 Q. Okay.

1 **A. -- which encompasses the staff and the inmates and**
2 **everything in it.**

3 Q. Okay. And so you have to have staff in order to
4 keep that facility secure, because it's a secure
5 facility and you don't want people breaking out;
6 right?

7 **A. Correct.**

8 Q. Okay. And Trousdale Turner houses what type of
9 inmates, what level, security level?

10 **A. Minimum and medium.**

11 Q. Okay. And sometimes are those prisoners violent?

12 **A. Any inmate can be violent or any prisoner, as you**
13 **said, can be violent.**

14 Q. Uh-huh.

15 And are there potential gang issues and
16 security threat group issues at Trousdale Turner?

17 **A. When you say "issues," I mean that's -- there are**
18 **some gang inmates at Trousdale Turner, as there are**
19 **in a lot of correctional institutions around the**
20 **United States.**

21 Q. Right.

22 So I mean it's important to have people that
23 can keep an eye on those situations for everyone's
24 safety is what I'm getting at; is that right?

25 **A. Yes, ma'am.**

1 Q. Okay. So what happens when you don't have enough
2 staff?

3 A. We have -- Well, when you say "enough staff," we
4 have staff that are assigned to the housing areas.
5 And if we need to secure the pod and control or
6 modify the movement, then we do that. We'll place
7 the inmates in their cells for a specific amount of
8 time to monitor and maintain security.

9 Q. Uh-huh. So I want to make sure that I understood
10 that answer correctly.

11 So if you're short on staff, you'll make sure
12 that the inmates aren't moving as much?

13 A. That's correct.

14 MR WELBORN, III: Object to the form.

15 Q. (BY MS. HERZFELD) So they're spending more time in
16 their cells when they would be out doing recreation
17 or other things; is that right?

18 MR WELBORN, III: Object to the form.

19 A. Yes, ma'am.

20 Q. (BY MS. HERZFELD) Okay. And what is the purpose
21 of having recreation and free movement for
22 prisoners within a facility?

23 MR WELBORN, III: Object to the form.

24 A. The inmates -- Repeat the question.

25 Q. (BY MS. HERZFELD) Sure.

1 I mean you've been doing this for 38 years, so
2 I mean what is the purpose of allowing prisoners to
3 come out of their cell and have some rec time and,
4 you know, a little bit more freedom of movement?

5 **A. Yes, ma'am. That way we can keep the inmates**
6 **occupied and have a setting to which they can also**
7 **have an interaction or social time as well.**

8 **Q.** Do you find that helps you to be able to keep
9 people under control a bit better, from a safety
10 and security aspect, when folks have a little bit
11 more freedom and they are not on lockdown all the
12 time?

13 **A. No, ma'am. No, I would not say that. And if you**
14 **look at locking an inmate behind a cell is probably**
15 **the most safety and security part of it, as you can**
16 **imagine, because then he's not moving around or**
17 **causing the violence that you spoke of earlier. So**
18 **that wouldn't necessarily be true the way you**
19 **worded that.**

20 **Q.** Okay. So let's talk about if someone is in
21 lockdown. So lockdown is going to be in their cell
22 23 hours a day?

23 **A. It depends. Not necessarily. Again, if he's in a**
24 **restrictive housing unit then that could very well**
25 **be the case.**

1 But if we're looking at a situation where the
2 staffing level may not be what we would like it to
3 be and we place them under a type of lockdown, it's
4 modified movement, so it wouldn't necessarily be
5 the 23 hours you spoke of.

6 What we try to do is have it in blocks to
7 where they might be closed down from 8:00 a.m. to
8 12:00 p.m. and then let them up in the afternoon
9 time and then secure another housing area. So we
10 alternate back and forth.

11 Q. Okay. And how many days has the facility not been
12 on some form of lockdown since you've been warden?

13 A. Oh, I don't know the exact number, but I would say
14 quite a bit. And, again, I don't know the exact
15 number.

16 Q. Okay. Would you say you're on some sort of
17 lockdown more often than not or not?

18 A. I would say, no. I mean we do have pieces of it
19 that -- you know, particular housing areas that we
20 might place under lockdown. But as a facility, no,
21 ma'am.

22 Q. Okay. And those particular housing areas, what are
23 they?

24 A. Oh, we rotate it to be fair.

25 Q. Okay. So the facility itself, does it generally

1 have some portion of it under some form of
2 lockdown?

3 **A. Other than the restrictive housing?**

4 Q. Yes, sir.

5 **A. What kind of -- Again, repeat the question because**
6 **I'm not sure that that's -- Repeat that question,**
7 **please.**

8 Q. Sure.

9 So other than protective housing, right --
10 which we've already talked about because we know
11 that that's different -- if I understand your
12 testimony correctly, you said you kind of do what
13 we'll just kind of call roving lockdowns, right --
14 this pod for this period of time and then this pod
15 for this period of time -- as you shift staff from
16 one pod to another? Did I understand that right?

17 **A. Yes, when we need to. Now, it's not -- And what**
18 **you were asking earlier about more often than**
19 **not -- I don't remember exactly how you worded**
20 **it -- but I would say that's not correct. But**
21 **occasionally we do do that to maintain the safety**
22 **and security.**

23 Q. Okay. And how often would you say that you do
24 that, that kind of, I'm going to call it, roving
25 lockdown?

1 **A. How often?**

2 Q. Yes, sir.

3 **A. Not very.**

4 Q. Okay.

5 **A. I mean it's kind of subjective in the time frame,**
6 **so I'd have to say not very often.**

7 Q. Okay. Is there a document somewhere that would let
8 me know the specific dates and how many?

9 **A. That I'm not going to say for sure.**

10 Q. Is it documented somewhere when there's some form
11 of lockdown or modified lockdown in a facility?

12 **A. Normally, yes.**

13 Q. Okay. And so do you have some concerns that normal
14 process hasn't been followed lately?

15 **A. No, ma'am, I don't have that concern.**

16 Q. So there should be documentation somewhere that
17 tells me how often somebody's been on -- you know,
18 a particular pod or if anybody's been on lockdown
19 for the past six months, for example?

20 **A. There could very well be, yes.**

21 Q. And you had said before that you-all hadn't been --
22 Trousdale Turner hadn't been in full compliance
23 with its staffing -- contractual staffing pattern
24 since you've worked there. You didn't really know
25 how much it had been deficient.

1 Is it your position that if those positions
2 aren't filled on a particular day, that they are
3 just not necessary?

4 **A. Is that my position?**

5 Q. Yes, sir.

6 **A. No, ma'am.**

7 Q. Okay. So if there's a position that's in the
8 contract for the facility, is it your position that
9 that's a necessary position?

10 That was a horrible question. I said position
11 like 15 times, so that was not a very good
12 question. I'm going to back up and start over
13 again.

14 So is it your position that you don't need all
15 of the -- all of the available jobs, all of the
16 jobs that are provided for in the contract, in
17 order to safely and securely run Trousdale?

18 **A. No, ma'am, that is not my position.**

19 Q. Okay. What is your position?

20 **A. To follow the contract and to maintain a safe and**
21 **secure correctional institution.**

22 Q. Okay. And what happens in a facility -- because
23 you've been doing this for so many years -- what
24 happens in a facility when it doesn't have
25 sufficient staffing? Can that create additional

1 instances of violence?

2 **A. When we do not -- or when the institution does not**
3 **have the adequate number of staffing, usually the**
4 **facility has to take measures to insure that safety**
5 **and security is still maintained, and sometimes**
6 **that includes locking the inmates in their cell for**
7 **a period of time to make sure that they are safe,**
8 **as well as the staff.**

9 Q. Okay. Because when you have less people, it's
10 harder to keep an eye on violent prisoners?

11 **A. When you say "violent prisoners," you know -- I**
12 **mean as we discussed earlier, any inmate can be**
13 **violent, but not all inmates are violent.**

14 Q. Right.

15 **A. So we have to have staff that are watching inmates.**

16 Q. Okay. And if you don't have as much staff does
17 that give more opportunity for violence?

18 **A. Not if you take the measures that we discussed a**
19 **minute ago. There are ways that you can still**
20 **maintain a safe and security institution. We do**
21 **offer -- We do have some overtime that the staff**
22 **work, but we also have some TDY opportunities where**
23 **staff are brought in from other facilities to help**
24 **out.**

25 Q. And you have had to do that at Trousdale Turner?

1 **A. It has been done.**

2 Q. Okay. And have you done that since you've been
3 warden?

4 **A. Yes, ma'am.**

5 Q. How many times?

6 **A. I don't know an exact number.**

7 Q. Would there be records somewhere that include that?

8 **A. Of how many TDY staff that are here?**

9 Q. Yes, sir.

10 **A. Yes.**

11 Q. And how much is the starting pay for your
12 corrections officers?

13 **A. 16.50.**

14 Q. Do you know that Target is starting people at \$15
15 an hour?

16 **A. I'm sorry?**

17 Q. Did you know that Target -- You know the store,
18 Target?

19 **A. I do know Target.**

20 Q. Do you know Target is starting people at \$15 an
21 hour?

22 **A. No, ma'am, I didn't know that.**

23 Q. My kid works there. It's interesting.

24 Okay. So you were talking about overtime.

25 Does Trousdale Turner have a mandatory overtime

1 policy?

2 **A. Yes, ma'am.**

3 Q. Okay. And what is the mandatory overtime policy?

4 **A. We offer the overtime to staff that are on their**
5 **days off -- or offered time for staff that are on**
6 **their days off to come in and work and they can**
7 **then work the posts that weren't necessarily filled**
8 **for that day.**

9 Q. Okay. And it's called "mandatory," so do they have
10 a choice?

11 **A. They do.**

12 Q. Okay. So why is it called "mandatory"?

13 **A. You said it.**

14 Q. You've never heard it called mandatory overtime?

15 **A. Typically in a mandatory overtime we have some**
16 **staff that would be mandated to stay past their**
17 **normal hours.**

18 Q. Okay. And have you had that happen at Trousdale
19 Turner since you've been warden?

20 **A. Yes, ma'am.**

21 Q. How often?

22 **A. I don't know. It could be -- I don't know. I'm**
23 **not sure.**

24 Q. Is it a pretty routine occurrence?

25 **A. You know, "routine," I hate to use that word, but**

1 **it has happened.**

2 Q. Are there documents somewhere reflecting how often
3 mandatory overtime has been in place since you've
4 been warden?

5 A. **Yes, in the staffing patterns -- I mean the shift**
6 **rosters. Excuse me, shift rosters.**

7 Q. In the shift rosters?

8 A. **Uh-huh.**

9 Q. I think for a period of time before you started it
10 was mandatory overtime pretty much all the time,
11 consecutively for a while. Is that how it's been
12 since you've been there?

13 MR WELBORN, III: Object to the form.

14 A. **I can't talk about before I was here.**

15 Q. (BY MS. HERZFELD) I'm asking about since you've
16 been there.

17 A. **No, I don't -- Not necessarily, no, ma'am. I**
18 **wouldn't say that it's all the time.**

19 Q. More than four days a week?

20 A. **It varies. You know, some weeks are different than**
21 **other weeks; some days are different than other**
22 **days.**

23 Q. Okay.

24 MS. HERZFELD: Joe, I'll get with you
25 after we're done with this deposition, but I'm

1 going to have to ask to have a bunch of our stuff
2 supplemented because he can't seem to answer the
3 questions on it, so I'm going to have to get those
4 documents. We can talk about it afterwards.

5 MR WELBORN, III: Can't seem to answer
6 what?

7 MS. HERZFELD: Specific questions about
8 the overtime and how many times they've been locked
9 down and, you know, those specific things since
10 he's been there in July, so I'm just going to have
11 to update those docs.

12 MR WELBORN, III: We'll consider it once
13 we talk about it.

14 MS. HERZFELD: Okay, great. Thank you.

15 Q. (BY MS. HERZFELD) Mr. Frink, we were talking about
16 the overtime.

17 Is there a maximum cap on how much overtime
18 someone can work, to your knowledge?

19 **A. Not to my knowledge, no, ma'am.**

20 Q. Okay. And do you know how much overtime people
21 work, on average?

22 **A. Again, it varies. You know, some people work very**
23 **little overtime; some people work more overtime.**
24 **If I had to average the numbers out, no, ma'am, I**
25 **don't know what that average is.**

1 Q. Okay. Do you feel you have enough staff at
2 Trousdale Turner as the warden, sir?

3 A. We have some vacancies that I would like to not
4 have. If we were in a perfect world, 100 percent,
5 then that would be what I would consider to be
6 enough.

7 So based on your question, I would like to
8 have a few more staff, yes.

9 Q. Okay. A "few more" meaning how many more? How
10 many more do you think you need?

11 A. I could certainly use about 15 or 20, for sure.

12 Q. Okay. Do you know what the average starting salary
13 is for someone in your area in a job outside of
14 Trousdale?

15 A. I do not, no, ma'am. I just know what we start at.

16 Q. Okay.

17 A. I know what the state of Tennessee starts at.

18 Q. What do they start at?

19 A. Well, I say I know that. I know it's less than
20 what we start at. I think it's 15-something an
21 hour, and we're at 16.50. If I'm not mistaken it
22 could be 15.25, but, again, I could be wrong about
23 that, but I know it's 15-something.

24 Q. Okay. And have you had any discussions with
25 Mr. Pleasant-Bey one-on-one?

1 **A. No, ma'am.**

2 Q. Have you ever spoken to him directly that you know
3 of?

4 **A. Yeah. As I walk by him I say, "Good day" or "Good**
5 **morning."**

6 Q. Okay. Are you familiar at all with any of the
7 grievances that Mr. Pleasant-Bey has filed in the
8 past?

9 **A. No.**

10 Q. Okay. And are you familiar with the grievance
11 policy in place at Trousdale Turner right now?

12 **A. I'm familiar.**

13 Q. Okay. And what happens if someone is told that
14 their grievance is nongrievable, are they given
15 options for appeal?

16 **A. Yes, ma'am, to my knowledge they are.**

17 Q. Okay. And what is -- what is that information that
18 they are given about appeal of a grievance that's
19 been determined to be nongrievable?

20 **A. From my understanding they can grieve it to the**
21 **TDOC facility or the TDOC supervisors.**

22 Q. Okay. And do you know how it is that they are
23 informed of that information?

24 **A. No, ma'am.**

25 Q. Okay. Do you know if it's in writing?

1 **A. I just said, no, ma'am, I don't.**

2 Q. Okay. So that's your understanding of what can
3 happen, but you don't if they are informed of that
4 in writing?

5 **A. Correct.**

6 Q. Okay.

7 MS. HERZFELD: If you will hold on for
8 just one second for me. We can go off the record.

9 (A discussion was held off the record.)

10 MS. HERZFELD: Okay. We're back on the
11 record.

12 Q. (BY MS. HERZFELD) Mr. Frink, can you hear me okay?

13 **A. Yes, ma'am.**

14 Q. Okay. I just want to make sure that we've talked
15 about today everything you know regarding
16 Mr. Pleasant-Bey's incarceration at Trousdale.

17 Is there anything you know about his
18 incarceration at Trousdale that we've not discussed
19 today?

20 **A. I would say, no, ma'am.**

21 MR WELBORN, III: Object to the form.

22 Q. (BY MS. HERZFELD) Okay. And it also says here
23 that you know about the customs, policies,
24 education, and training at Trousdale. We haven't
25 really discussed that today.

1 What do you know about the customs, policy,
2 education, and training at Trousdale regarding
3 religious freedom rights of prisoners?

4 **A. The training that is given to the staff, is that**
5 **what you're asking?**

6 Q. I suppose. It says that you know about the
7 customs, policy, education, and training at the
8 facility. So I'm sorry to have to ask you, but I
9 don't know what that means.

10 **A. I gotcha.**

11 The only thing I can tell you, based on what
12 you're asking me, is that we offer a comprehensive
13 in-service -- pre-service training to all the staff
14 at the time of the hiring, and then there's a
15 yearly in-service that's given where we go over a
16 lot of different topics, of which security and, you
17 know, education is all given.

18 But if you're asking about just the education
19 of the staff, then I wouldn't.

20 Q. Okay. Have we talked at all -- we talked about all
21 the religious policies that you know regarding
22 Muslim inmates.

23 Is there anything else that I'm not aware of
24 that we haven't discussed today?

25 **A. No, ma'am, not that I know of that you're not aware**

1 **of.**

2 Q. Okay. And what about specific customs, policies,
3 education or training about insufficient staff at
4 Trousdale? Is there any education, custom or
5 policy about what to do with the lack of staff?

6 A. **No. We have safety and security procedures where**
7 **we discuss being safe and secure, but nothing that**
8 **specifically says lack of staff, no.**

9 Q. Okay. And have we discussed everything you know
10 today about the allegations in this lawsuit?

11 Is there anything you know at all about the
12 allegations in this lawsuit that we haven't talked
13 about today?

14 A. **No, ma'am, I don't think so.**

15 Q. Okay. Then I don't think I have any more questions
16 for you. Thank you so much, Warden.

17 A. **Thank you, ma'am.**

18 MR WELBORN, III: No questions.

19 MS. HASHEMIAN: No questions. Thank you.

20 MR WELBORN, III: Thanks, Warden.

21 MS. HERZFELD: Okay. Thanks so much.

22 Joe, I'll follow up with you.

23 MR WELBORN, III: All right.

24 (The signature of the witness was waived
25 and the deposition was adjourned at 2:21 p.m.)

REPORTER'S CERTIFICATE


STATE OF TENNESSEE)
COUNTY OF MAURY)

I, **MARTA G. HARRA**, LCR #468 and CCR #0317,
a licensed court reporter in and for the State
of Tennessee, do hereby certify that I recorded
to the best of my skill and ability by machine
shorthand all the proceedings in the foregoing
transcript, and that said transcript is a true,
accurate, and complete transcript of my
shorthand notes.

I further certify that I am not related to
nor an employee of counsel or any of the
parties connected with the action, nor am I in
any way financially interested in the outcome
of this case.

I further certify that I am duly licensed by
the Tennessee Board of Court Reporting as a
Licensed Court Reporter as evidenced by the LCR
number and expiration date following my name below.

SIGNED this 7th day of NOVEMBER 2021.


MARTA G. HARRA
Licensed Court Reporter #468
Certified Court Reporter #0317
Expiration Date: 6/30/2022

<p>MR WELBORN, III: [18] 15/19 16/11 18/4 18/12 27/16 32/1 34/24 39/5 41/13 41/17 41/22 50/12 51/4 51/11 54/20 56/17 56/19 56/22 MS. HASHEMIAN: [1] 56/18 MS. HERZFELD: [9] 23/15 23/18 30/16 50/23 51/6 51/13 54/6 54/9 56/20 THE REPORTER: [1] 23/17</p>	<p>37203 [1] 1/20 37243 [1] 1/24 38 [3] 34/10 35/12 42/1 38-plus [1] 34/10 3:19-CV-00486 [1] 1/4 3M [1] 6/4</p>	<p>agreement [1] 25/21 Ah [1] 8/17 ahead [1] 28/7 aids [2] 8/21 8/22 al [1] 1/5 alcohol [3] 20/12 21/2 21/10 all [27] 3/6 3/9 22/16 26/8 27/10 28/14 28/18 28/21 30/6 33/19 37/16 42/11 45/21 46/14 46/15 46/15 47/13 50/10 50/18 53/6 55/13 55/17 55/20 55/20 56/11 56/23 57/7</p>	<p>28/10 30/23 approve [1] 28/19 approved [1] 24/24 are [61] area [4] 20/16 22/14 43/9 52/13 areas [3] 41/4 43/19 43/22 aren't [2] 41/12 46/2 around [7] 8/4 9/25 15/2 24/23 33/11 40/19 42/16 artifacts [1] 12/17 as [37] 3/8 3/10 4/2 4/3 4/23 5/5 7/17 11/16 14/24 15/6 17/19 17/20 17/25 20/5 21/10 27/11 28/18 29/11 33/17 35/12 35/17 35/23 40/12 40/18 41/12 42/7 42/15 43/20 44/15 47/8 47/8 47/12 47/16 52/2 53/4 57/14 57/15 ask [6] 9/11 35/2 36/7 39/2 51/1 55/8</p>	<p>27/15 28/11 29/11 29/20 30/24 based [6] 28/22 35/5 37/5 37/8 52/7 55/11 be [50] 10/24 11/17 14/8 14/20 14/21 14/23 16/7 16/17 17/25 19/7 19/15 27/12 28/3 28/10 28/11 29/7 29/11 29/12 29/19 30/1 30/24 33/19 34/14 37/3 38/9 38/24 39/1 40/12 40/13 41/16 42/8 42/18 42/21 42/25 43/2 43/3 43/4 43/7 43/24 45/16 45/20 47/12 48/7 49/16 49/22 52/5 52/5 52/22 52/22 53/19</p>
<p>\$ \$15 [2] 48/14 48/20</p>	<p>4 468 [3] 1/14 57/5 57/21 482-0037 [1] 1/13</p>	<p>allegations [4] 12/8 12/11 56/10 56/12 allow [1] 26/18 allowed [2] 21/5 26/14 allowing [1] 42/2 already [4] 18/6 18/8 33/8 44/10 also [7] 7/6 10/22 13/15 22/24 42/6 47/22 54/22</p>	<p>asked [4] 14/17 16/22 22/2 34/24 asking [7] 33/13 35/8 44/18 50/15 55/5 55/12 55/18 aspect [1] 42/10 assesses [1] 37/4 assessment [1] 28/15 assigned [6] 5/6 6/12 6/13 11/8 35/14 41/4 assistant [3] 13/21 13/22 16/20</p>	<p>because [21] 10/22 14/21 15/2 16/25 17/2 19/7 20/11 22/13 25/14 30/3 33/17 36/8 37/18 39/1 40/4 42/16 44/5 44/10 46/22 47/9 51/2</p>
<p>0 0037 [1] 1/13 00486 [1] 1/4 0317 [3] 1/15 57/5 57/21</p>	<p>5 50 [1] 38/8</p>	<p>amendments [1] 29/5 amount [1] 41/7 another [2] 43/9 44/16 answer [6] 9/12 16/15 36/13 41/10 51/2 51/5 any [36] 10/6 15/13 16/7 16/17 20/10 20/25 22/10 24/10 25/24 25/25 26/5 26/19 29/7 31/3 31/19 32/4 32/5 32/10 32/13 32/17 33/1 33/1 33/4 37/21 38/21 39/4 39/11 40/12 40/12 47/12 52/24 53/6 56/4 56/15 57/11 57/12 anybody [6] 10/1 10/4 10/16 13/19 26/3 30/17 anybody's [1] 45/18 anyone [4] 25/24 32/10 32/13 37/21 anything [12] 10/13 11/10 11/12 11/18 17/11 22/18 24/14 25/6 26/13 54/17 55/23 56/11 anywhere [3] 16/4 18/15 25/22 apparently [1] 23/14 appeal [2] 53/15 53/18 APPEARANCES [2] 1/17 2/1 approach [1] 32/25 appropriate [3] 16/11</p>	<p>ASSOCIATES [1] 1/12 assure [1] 39/20 attending [1] 18/20 attorney [2] 1/22 27/18 attorney/client [1] 27/18 audio [2] 23/10 30/15 availability [1] 20/22 available [1] 46/15 Avenue [3] 1/12 1/19 2/4 avenues [1] 33/3 average [4] 51/21 51/24 51/25 52/12 aware [13] 13/14 14/25 15/5 15/8 15/11 15/11 15/22 19/20 26/19 31/20 32/3 55/23 55/25 aye [2] 40/23 47/10</p>	<p>been [65] before [14] 1/11 5/10 6/25 9/13 14/8 14/10 18/8 28/14 28/23 30/21 33/8 45/21 50/9 50/14 behalf [2] 1/10 3/5 behind [1] 42/14 being [14] 3/12 7/17 10/16 11/16 11/24 13/10 18/23 19/14 26/14 27/8 27/11 30/4 31/23 56/7 believe [3] 15/15 24/6 25/5 below [1] 57/15 best [1] 57/7 better [4] 23/13 30/12 32/7 42/9 between [2] 21/22 35/9 BEY [12] 1/3 4/8 11/2 11/5 17/23 19/20 25/1 26/1 26/11 31/20 52/25 53/7 Bey's [10] 12/5 12/11 15/12 15/18 15/22 26/6 32/12 32/21 33/24 54/16 birth [1] 4/17 bit [6] 8/12 28/13 42/4 42/9 42/10 43/14 blocks [1] 43/6 Board [1] 57/14 boat [1] 10/24 BOAZ [1] 1/3 book [1] 27/12 both [1] 27/1 BRANSTETTER [1] 1/18 break [4] 9/8 9/9 9/11 9/13</p>
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